

From: ["Brooks, Karl" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP \(FYDIBOHF23SPDLT\)/CN=RECIPIENTS/CN=78AC91F4DB6D44F58424B504D5AA3C7D-BROOKS, KARL>](mailto:Brooks.Karl@epa.gov)  
To: [Hammerschmidt](#)  
[Ron;Thomas](#)  
["Hattie; Tapia"](#)  
[Cecilia](#)  
CC: [Hague](#)  
[Mark](#)  
Date: 8/16/2013 11:59:53 AM  
Subject: FW: Congressional Inquiry from Congressman Wm. Lacy Clay to the EPA  
Attachments: [Clay\\_SHARP@mail.house.gov\\_20130802\\_153848.pdf](#)

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Hattie: is this in CMS? Ron/CT: is this one of the responses you mentioned today?

Karl Brooks  
Regional Administrator  
EPA Region 7  
913-551-7006

-----Original Message-----

From: Engelhardt, Steven [mailto:Steven.Engelhardt@mail.house.gov]  
Sent: Friday, August 16, 2013 11:46 AM  
To: Brooks, Karl  
Subject: FW: Congressional Inquiry from Congressman Wm. Lacy Clay to the EPA

Please note attached letter and documents sent to Administrator McCarthy.

Nothing new here, but just wanted you to have for your files.

Thanks.

SBE

-----Original Message-----

From: Engelhardt, Steven

Sent: Wednesday, August 14, 2013 2:06 PM

To: Engelhardt, Steven

Subject: Fw: Congressional Inquiry from Congressman Wm. Lacy Clay to the EPA

----- Original Message -----

From: Jamry, Pauline

Sent: Friday, August 02, 2013 03:53 PM

To: 'Kat Logan Smith' ; 'esmith@moenviron.org' ; 'dmcteacher@gmail.com' ; 'emmj.nix@gmail.com'

Cc: Piggee, Darryl; Engelhardt, Steven; Aboussie, Lou

Subject: Congressional Inquiry from Congressman Wm. Lacy Clay to the EPA

Hello,

The attached Congressional Inquiry regarding West Lake Landfill was emailed, faxed, and mailed today to EPA Administrator Gina McCarthy from Congressman Wm. Lacy Clay. Please share with all interested parties and constituents. Thank you.

Sincerely,

Pauline Jamry

Legislative Counsel

Office of Congressman Wm. Lacy Clay (MO-1)

2418 Rayburn House Office Building

Washington, D.C. 20515

Phone: 202.225.2406

Fax: 202.226.3717

Pauline.Jamry@mail.house.gov

<http://lacyclay.house.gov/>

Wm. LACY CLAY  
1ST DISTRICT, MISSOURI

COMMITTEES:  
FINANCIAL SERVICES

Ranking Member,  
SUBCOMMITTEE ON  
DOMESTIC AND INTERNATIONAL  
MONETARY POLICY

OVERSIGHT AND  
GOVERNMENT REFORM

Member,  
SUBCOMMITTEE ON  
FEDERAL WORKFORCE,  
U.S. POSTAL SERVICE AND THE CENSUS

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**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-2501**

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111 S. Tenth Street, Suite 24.344  
St. Louis, MO 63102  
(314) 367-1970  
(314) 367-1341 Fax

August 2, 2013

Administrator Gina McCarthy  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW, Room 3426 ARN  
Washington, DC 20460

Dear Administrator McCarthy,

I am writing this letter in regards to the West Lake Landfill located in my district. West Lake contains radioactive waste, and is currently under the jurisdiction of the Environmental Protection Agency (EPA).

In May 2008, after conducting environmental testing, the EPA issued its Record of Decision that stated the Formerly Utilized Sites Remedial Action (FUSRAP) program was not the appropriate federal program for remediating West Lake waste material. FUSRAP is under the jurisdiction of the Department of Energy (DOE) and the Army Corps of Engineers. The remediation plan adopted by EPA in its Record of Decision requires the agency to monitor the West Lake site to ensure that its remediation efforts are effective and that no air or groundwater contamination occurs.

Since May 2008, my constituents are and have been very concerned with EPA's remediation efforts at the West Lake site. Their concerns stem from many factors: 1) There is a lack of any type of lining between the radioactive waste and the soil which the waste sits on; 2) The waste is covered with a few inches of top soil lining that routinely blows away with wind; 3) The close proximity of the radioactive waste to another landfill called the Bridgeton Landfill, which has a subsurface fire that is not under control as of today's date; 4) The close proximity of West Lake to area schools, homes, and local businesses; and 5) The recent local air and groundwater testing conducted by the EPA, both of which show elevated levels of dangerous hazardous material.

I have continued to bring constituent inquiries about the West Lake landfill to the attention of EPA in an effort to ensure that the public safety is not jeopardized by EPA's remediation plan. I have attached the following documents from my constituents. The first document is a petition to EPA, asking the agency to review the May 2008 Record of Decision and transfer control of the West Lake remediation over to the Army Corps of Engineers' FUSRAP program for remediation, pending approval from DOE. The second document contains a series of letters to the EPA from the Missouri Coalition for the Environment and my constituents, which outline various questions and concerns regarding the remediation of West Lake.

I look forward to a response from your office addressing these pressing concerns regarding West Lake Landfill. Please feel free to contact my Chief of Staff, Darryl Piggee, at 202-225-2406, or by email at [Darryl.Piggee@mail.house.gov](mailto:Darryl.Piggee@mail.house.gov) if you have any questions. Thank you.

Sincerely,



Wm. Lacy Clay  
Member of Congress

July 11, 2013

Senator Blunt, Senator McCaskill, Congressman Clay, and Congresswoman Wagner,

Communities around the West Lake Landfill Superfund Site in west St. Louis and St. Charles County need your help, leadership, and teamwork at this critical juncture. Over 600 people from the area attended the EPA meeting at Pattonville High School on June 25, 2013 and two things are clear, the community demands:

1. **The Army Corps of Engineers be put in charge on the West Lake Landfill Superfund Site.**
2. **The removal of nuclear weapons wastes from the smoldering, unlined landfill, which sits in an urban area, seismic zone, and tornado prone floodplain of the Missouri River.**

We urge you to work together to put West Lake Landfill on the fast track to becoming a Corps of Engineers Formerly Utilized Sites Remedial Action Program (FUSRAP) Site because the Corps has the local, technical expertise from its handling and removal of over 1,000,000 cubic yards of the same radioactive materials in St. Louis City and County.

We urge you to work together to secure our drinking water from the constant threat of contamination from the radioactive wastes that will be toxic for thousands of years. A floodplain is no home for such long-lived wastes.

Sincerely,

Attendees of the West Lake Landfill Community Meeting



Sign on sheet for our Federally Elected Officials:

- Put FUSRAP in charge of West Lake Landfill.
- Remove the radioactive wastes, NOW.

Signature	First (Print)	Last (Print)	Address (print)	City	Zip	Phone #
<i>[Signature]</i>	Jennifer	Smith	1604 Silver Hill Ct	Wentzville	6338	636 696-3701
<i>[Signature]</i>	Travis	Huber	2524 Cree Cove Mill Dr	Maryland Heights	63043	314-344-9052
<i>[Signature]</i>	DONNA	Klocke	2690 Timberside	Maryland Heights	63043	(314)-291-1631
<i>[Signature]</i>	Stacy	Chenoweth	3318 Greenbridge	Bridgeton	63044	(314) 809-5946
<i>[Signature]</i>	Barb	MINNARD	12743 Red Fox Ct	Maryland Heights	63043	636 671-2438
<i>[Signature]</i>	Katie	Keever	3314 Bridgeton Trails Dr.	Bridgeton	63044	
<i>[Signature]</i>	Jay	Black	3022 Autumn Lakes Dr	Maryland Heights	63043	314-269-7109
<i>[Signature]</i>	Rio	Schandelbauer	30 Windwing stair Way	O'Fallon	63368	636- 614-5014

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Signature	First (Print)	Last (Print)	Address (print)	City	Zip	Phone #
<i>Irma Kennebeck</i>	IRMA	KENNEBECK	3221 McKENNEY RD	BRIDGETON	63044	314-768-1826
<i>Loretta Gettemeier</i>	Loretta	Gettemeier	3223 Parkwood Lane	Maryland Heights	63043	314-739-7450
<i>Jodi Willard</i>	Jodi	Willard	11846 Administration Dr	Bridgeton	63044	314-739-7124
<i>Ferdinand &amp; Felicia</i>	Ferdinand & Felicia	FETSCHE	3336 TUSCANY AVE	BRIDGETON	63044	314-291-3021
<i>Diane Shockley</i>	Diane	Shockley	11840 Melody LN	Bridgeton	63044	314-739-5872
<i>Sandra Buzetta</i>	Sandra	Buzetta	192 HUNTERS POINTE	ST. CHARLES	63304	314-498-0633
<i>Katie Lamb</i>	Katie	Lamb	12022 Autumn Hills Dr	Maryland Heights	63043	314-223-1230
<i>Danella Fritz</i>	Danella	Fritz	645 Cayola Drive	Florissant	63031	314-972-7236
<i>M. McConnell</i>	Melissa	McConnell	12130 Nantucket Pl	Maryland Heights	63043	314-757-1979
<i>Melvin Vatterott</i>	Melissa	Vatterott	310 Geyer Forest Drive	St. Louis	63122	314-581-0561

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Signature	First (Print)	Last (Print)	Address (print)	City	Zip	Phone #
A Betty	Betty	Bruce	3393 McKelvey 63044	Bridgeton	63044	609-4244
D. H. H.	Dave	Staab	2672 McKelvey 1206 Autumn Lakes Dr.	Mid Hts Maryland Hts	63043	314-363-5119
Raul Fein	Raul	Fein	2504 Crum-Coe Mill #9	Maryland Hts	63043	314-344-9052
Jennifer Huber	Jennifer	Huber	1604 Silver Hills ct	Wentzville Mo	63385	636-887-0883
Susan Foltz	Susan	Foltz	12138 Autumn Lakes	Maryland Heights	63043	317-540-0947
Sonya PTAH	Sonya	PTAH	3077 Donnell Drive	Maryland Heights	63043	314-277-4567
Lori Gilbert	Lori	Gilbert	3183 Autumn Lakes Dr	Maryland Heights	63043	314-209-0227
John Fischer	John	Fischer	4006 High Meadow Dr.	Robertsville	63072	636-271-7859
Kris Paglus	Kris	Paglus	3386 Tostone Dr	Bridgeton	63044	314-291-4689
Bob Nowlin	Bob	Nowlin	11204 Oak Hill Manor Dr.	Bridgeton	63044	314-780-1486
Byron Vera Saunders	Byron	Saunders				

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Signature	First (Print)	Last (Print)	Address (print)	City	Zip	Phone #
SR. FRANCES HAARMANN	FRANCES	HAARMANN	7318 Ethel	ST. LOUIS	63117	314-781-2421
Margita Anne Marshall	Marita	Mannah	7311 Hoover	Richmond Heights	63117	314-645-4759
Barbara Eliza	Barbara Eliza	Ray	12835 Tall Tree Ct	Hazelwood	63042	314-402-4810
Bonnie Kinnard	Bonnie	Kinnard	12743 Red Fox Ct	Maryland Hts	63043	573-301-0460
Carl Crappell	1430	Crappell	Longview Dr	FLOR	63033	
Rhonda Steelman	Rhonda	Steelman	3412 Ludlow Ave	BRIDGEON	63044	314-800-7455
Lynne Leake	Lynne	Leake	3512 El Ferrole	Bridgeton	63044	314-600-6588
Jeanne Hendrickson	Jeanne	Hendrickson	2731 Warren Ave	Granite City	62040	314-828-6141
Chuck Bell	Chuck	Bell	12736 San Clemente	Bridgeton	63044	314-298-0223
Maria Muehle	Maria	Muehle	2458 Wesley Drive	W Maryland Hts	63043	314-200-8942
FE Richards	FE	Richards				

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- Remove the radioactive wastes, NOW.

Signature	First (Print)	Last (Print)	Address (print)	City	Zip	Phone #
Susan Siegel	Susan	Siegel	950 Chula Dr.	Hazelwood	63042	314-971-4595
<del>Dr. C. Banner</del>	Douglas	Clemens	10825 Springs Ave	Bridgeton	63074	314-285-3498
<del>Dr. C. Banner</del>	Christine	Banner	5393 McFarlane	Bridgeton	63044	314-202-5842
Mary J. Schieber	Mary	Schieber	9559 Grandview Dr	St Louis	63132	314-872-1777
Becky VanHull	Becky	VanHull	5400 Rainbow Dr	Housesprings	63051	636-775-5063
Debi Danner	Debi	Danner	9094 Tetruck Dr	St. John	63114	314-629-0705
Sean A. Lange	Sean	Lange	2550 Cheshire Dr	Florissant	63023	314-910-1493
Marilyn Greenwald	MARILYN	GREENWALD	2332 Charlemagne	Yrd. Hgt.	63043	314-555-1212
<del>Vicki Loux</del>	Vicki	Loux	11972 Kentwood	Ind. Hgt.	63043	314-209-9572
Pat Camp	Pat	CAMP	11920 SACTHE DR	MARYLAND HGT	63043	314-374-8010



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- Remove the radioactive wastes, NOW.

Signature	First (Print)	Last (Print)	Address (print)	City	Zip	Phone #
<i>Debbie Newman</i>	Debbie	Newman	15730 San Clemente Drive	Bridgeton	63044	314 313-9033
<i>Jeanne Dener</i>	JEANNE	DENER	8840 GLENWOOD DR.	CRESTWOOD	63126	314. 849.2404
<i>Jeanne Neuer</i>	JEANNE	NEUER	3393 McKelvey	Bridgeton	63304	314- 2148-344
<i>Karen Heath MD</i>	Karen	Heath, MD	#1010 710 S Grand	St. Louis	63118	314- 256-1151
<i>Carla Miller</i>	Carla	Miller	3034 Autumn Lakes Ct	Maryland HTS	63043	636- 536-2094
<i>Kathy Bell</i>	Kathy	Bell	12736 San Clemente	Bridgeton	63044	314-298- 0223
<i>Shannon</i>	Shannon	Kuczy	2325 Pleasanton	Maryland HTS	63043	314 3634604
<i>Linda Eaker</i>	LINDA	EAKER	3255 Autumn View Pointe Dr.	BRIDGETON	63044	314-291-3880
<i>Bruce Newman</i>	Bruce	Newman	12730 San Clemente Dr	Bridgeton	63044	314 313-9033
<i>Jemell Wright</i>	Jemell	Wright	3 Yorkshire Ct, Edwardsville, IL		62025	618 304-8532
<i>Martin</i>	MARTIN	WALLER	9680 LINCOLN DR	WORDEN	62097	618-298- 5883



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Signature	First (Print)	Last (Print)	Address (print)	City	Zip	Phone #
Alexandra Duly	Alexandra	Duly	302 Dora Pl.	O'Fallon	<del>63043</del> 63043	636-544 -1470
Karen Nickel	Karen	Nickel	12141 Hillcrest Pl	Maryland Hts	63043	3142294896
Martha Hall	Martha	Hall	11916 Glenpark	Maryland Hts	63043	314-298-6163
Sandra	Sandra	Darr	846 Sugarbush &	St Peters	63076	
Jerry	Jerry	Grimmer	12016 Avery Ln.	Bridgeton	63044	314 739-7491
Regina Richards	Regina	Richards	12057 Glen Grove	Maryland Hts	63043	314.368.3407
Traci Vette	Traci	Vette	3009 Charnock Ln.	"	63043	
Brianne McDonald	Brianne	McCormick	3420 San Seville Ct	Bridgeton	63044	
Randal Han	Randal	HEIN	4137 SCOTCH DR	Bridgeton	63044	
Sandy Schwartz	SANDY	Schwartz	3301 McKewen Rd	Bridgeton	63044	314-968-1828
Kathy Vogels	Kathy	Vogels	10521 Litch	St Ann	63074	314280711



# Missouri Coalition for the Environment

Effective Citizen Action Since 1969

May 23, 2013

Karl Brooks  
Regional Administrator, Region 7  
Environmental Protection Agency  
11201 Renner Blvd.  
Lenexa, KS 66219

RE: West Lake/Bridgeton Landfill Superfund Site

Dear Mr. Brooks:

A subsurface landfill fire is burning in the proximity of nuclear weapons wastes in Bridgeton, Missouri. The odor from the landfill fire has impacted tens of thousands of people and concern about it contacting the nuclear weapons wastes is growing. The EPA announced in January the landfill fire was 1,200 feet from the nuclear weapons wastes. In May, the Missouri Attorney General announced the landfill fire is 1,000 feet away from the nuclear weapons wastes. EPA employees have stated several times this year that it is not possible for the landfill fire to reach the nuclear weapons wastes.


The Missouri Coalition for the Environment and the undersigned members of the adjacent communities would love to be as confident as your staff that the fire will not reach the nuclear weapons wastes. Please help us understand your position so that we may know our communities are safe. Please answer our questions:

1. Can the EPA say with 100% confidence that the landfill fire will not reach the nuclear weapons wastes? If yes, will the EPA explain to the community, in detail, the information it is using to make this determination. If no, what is the EPA plan to ensure the fire does not reach the nuclear weapons wastes?
2. How does EPA explain that the temperatures in the landfill past the interceptor wells are rising above levels of concern- 170 degrees at several of the monitoring wells including at TMP5, TMP13 and TMP14?
3. The EPA Remedial Investigation for the West Lake Landfill OU-1 (pg. 80) indicates that the normal groundwater flow is toward the Missouri River. However, its normal flow was being influenced by the leachate collection system in the adjacent landfill. It's our understanding that the leachate collection pumps have stopped working at the Bridgeton landfill. How will this affect groundwater flow in the West Lake Landfill OU-1 Area 1 and 2?

4. Is the EPA sampling groundwater between West Lake OU-1 and the Missouri River or anywhere offsite?
5. Will EPA provide the data on groundwater sampling locations, results, and plans?
6. How often is EPA sampling groundwater monitoring wells? What days did the EPA sample groundwater at the site in 2012 and 2013? What is the schedule for groundwater sampling in 2013?
7. Groundwater plumes are often seen at superfund sites where soil has been contaminated with chemicals. Soil is not the same as landfill waste. Would EPA expect to find a groundwater plume in a heterogeneous mixture of materials such as can be found in the West Lake landfill?
8. How would groundwater behave in landfill material that might be different from how groundwater would behave in a homogeneous material like soil?
9. What information would EPA need in order to predict groundwater movement in landfill material with some degree of accuracy? Does the agency have this information?
10. Has the EPA conducted community interviews of "impacted communities" in the last 10 years? If yes, does EPA have evidence to support that community interviews were conducted? If yes, how have community interviews guided EPA response to community concerns? If no, what is the EPA plan for conducting community interviews and when will people be notified?
11. In March, EPA told the public that it flew the Aspect plane over the area to measure airborne radiological hazards. Where is the data from the Aspect plane?
12. Will EPA provide the raw data to the public?
13. What are the abilities and limitations of the ASPECT plane monitors?
14. Did the ASPECT plane conduct a thermal analysis of the landfill?
15. Who requested the ASPECT plane flyover?
16. Why was the ASPECT plane flown over?
17. Where did it take measurements?
18. Does the EPA have any air data on radon/radon daughters from north St. Louis?

Thank you for your consideration of our concerns.

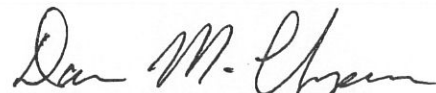
Yours truly,



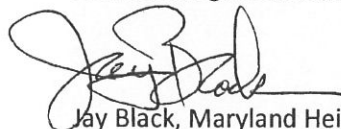
Kathleen Logan Smith, MCE



Ed Smith, MCE



Dawn Chapman, Maryland Heights



Jay Black, Maryland Heights

Bob Nowlin, Bridgeton



Kay Drey  
Kay Drey, Beyond Nuclear

1. Beth Strohmeier

BETH STROHMEIER

2. Doug Clemens

Douglas Clemens

3. Julie Pitzner

Julie Pitzner

4. Stacy L. Chenoweth

Stacy L. Chenoweth

5. Brad Chenoweth

BRADLEY D. CHENOWETH II

6. Sharon L. Duisen

Sharon L. Duisen

7. Robert Duisen

Robert Duisen

8. Megan Richardson

Megan Richardson

MARYLAND HEIGHTS

St. Ann

Hawk Point

Bridgeton

BRIDGETON

Bridgeton

Bridgeton

St. Peters

9. Cheryl Lokke

Cheryl L. Lokke

St John. MO

10. F. Scott Kenney

F. Scott Kenney

ST CHARLES, MO

11. Sharon Kenney

St. Louis MO 63114

12. Clare Duffy

Maryland Hts.

13. Sara Schumacher

St Louis, MO 63116

14. Frances M. Haxmann

St-Louis, MO. 63117

15. Jeanne Meunier

Bridgeton MO 63044



16. Mary Chaudet
17. Jeanne Derer
18. Melisa Skuen
19. Paula Frey
20. Dill Skilla
21. Kathryn C Hallard
22. John Munn
23. MKE DUNNIGAN
24. Gale Thackrey
25. Rio Schandlmyer
26. ELLIOT Rhoad
27. Nancy Hough
28. Kathy Bell
29. Chuck Bell
30. Debbie Neuman
31. Bruce Neuman
32. William L. Wilson, Jr.
33. Lori Gilbert
34. Lynn A. Leke
35. Donna Klocke
36. Vicki Loux
37. PAT CAMP ~~Patricia~~ Camp
38. Debi Disser
39. Jenna Hodges
40. Jlo Janitch
41. ANDREA CROUCH
42. Bob Nowlin

FERGUSON 63136

CRESTWOOD 63126

St. Louis 63114

Maryland Hts 63043  
Bridgeton, MO 63044  
Bridgeton, MO 63044  
BRIDGETON, MO. 63044

Bridgeton, MO 63044  
O'Fallon MO 63368  
Chesterfield, MO 63017  
St Charles, MO 63304

Bridgeton, MO 63044  
Spanish Village Bridgeton M.  
Spanish Village, Bridgeton  
Spanish Village, Bridgeton

Spanish Village, Bridgeton

Maryland Heights 63043  
Bridgeton mo (spanish village  
Maryland Hts MO  
Maryland Hts, MO 63043  
MARYLAND HTS MO 63043  
St. John, MO ~~63043~~ 63114  
Florissant MO 63031  
Maryland Hts, MO 63043  
MARYLAND HTS, MO 63043  
Bridgeton-Spanish Lake

16. DORIAN BOSCANI

Bridgeton MO 03040

17. Elliott Rhod

Chesterfield, MO 63017

18 Mary Lou Burke

Maryland Hgts 63043

19 David Kershman

Maryland Hgts 63043





# Missouri Coalition for the Environment

Effective Citizen Action Since 1969

## Questions for EPA

June 18, 2013

Karl Brooks  
Regional Administrator, Region 7  
Environmental Protection Agency  
11201 Renner Blvd.  
Lenexa, KS 66219

RE: West Lake/Bridgeton Landfill Superfund Site

Dear Mr. Brooks:

The Missouri Coalition for the Environment (MCE) requests a meeting to go over questions submitted to the EPA dated May 23, 2013 and the questions below regarding the West Lake Landfill Superfund Site in St. Louis County, Missouri. MCE would like to meet with EPA staff before the June 25, 2013 public meeting scheduled at Pattonville High School so we can have an in-depth conversation regarding MCE and community concerns at West Lake Landfill. Will EPA meet with MCE before the June 25 meeting? If a meeting cannot be scheduled for June 25, will EPA please provide a written response to unanswered questions from the May 23 letter and questions listed below?

1. The EPA's 2008 Record of Decision on West Lake Landfill makes numerous assumptions about the inability of the radioactive wastes to move offsite based on current site conditions. The data also shows that the radioactive wastes will become more radioactive for the next 9,000 years. West Lake Landfill sits in a floodplain, in an urban area, and in a seismic zone; recently, several tornadoes have come close to touching down at the landfill; and there is a "subsurface smoldering event" in the landfill in close proximity. What guidance/statute/regulation does EPA use when determining long-term risk at Superfund Sites that will remain contaminated virtually forever?
  - a. The Japanese and United States governments never considered multiple events compromising nuclear reactors, like the earthquake and tsunami that hit Fukushima in Japan, crippled three reactors, and damaged safety systems. Has the EPA developed a risk assessment that considers multiple disasters impacting the spread of radioactive wastes at the West Lake Landfill?
2. Does the EPA contend that 8,700 tons of leached barium sulfate from Latty Avenue was mixed with 38,000 tons to 39,000 tons of "clean material" as stated in the Responsiveness Summary (page 13)?
3. How does the EPA explain levels of Radium-226 and Radium-228 outside of Operable Unit - 1? For example: The Responsiveness Summary from 2008 (page 3) states "only four wells exhibited a total radium concentration above the MCL of 5 picocuries per liter (pCi/l)" with the maximum reading



# Missouri Coalition for the Environment

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being 6.33pCi/l. A map in the Groundwater Monitoring report dated December 14<sup>th</sup>, 2012 (page 84) displays 20 wells that show radium levels above 5pCi/l with PZ-101-SS reading 32.01pCi/l, which is outside of Area-1 and Area-2 of Operable Unit 1. With the increase in the concentration of Radium from the wells, how can the EPA continue to state that the levels of Radium being read are naturally occurring?

- a. Does naturally occurring Radium increase its radioactivity over time?
- b. Can the EPA explain the increase in the level of radium in the wells above 5 pCi/l?
4. Given that the radioactive wastes were dumped at West Lake 40 years ago and Dr. Criss's conclusion that the "radiologically-contaminated groundwaters have moved substantial lateral distances away from the original areas where the radwaste was dumped, and also have entered subjacent Mississippian bedrock," is it more likely that the levels of Radium-226 and Radium-228 are elevated because they are from the radioactive wastes that were dumped and therefore are not naturally occurring as the EPA currently concludes?
5. Besides the ASPECT plane and groundwater testing, is the EPA doing anything else (i.e. soil samples) to improve its understanding of the West Lake Landfill and the radioactive materials that are present?
6. Is the EPA conducting groundwater samples outside the West Lake Landfill? If no, why not? If no, how can the EPA claim the radioactive wastes have not moved off site? If yes, can the EPA provide the data?
7. How can the EPA conclude that the radioactive materials are contained based on the ASPECT plane, which only measured gamma radiation up to one foot, while the radioactive wastes are buried up to 15 feet deep and there is no liner to prevent groundwater contamination?
8. Is there a "red line" to trigger the removal of the radioactive wastes in context to the smoldering landfill event and its apparent progression north towards Area 1?
9. Has the EPA conducted community interviews of "impacted communities" in the last 10 years? If yes, does the EPA have evidence to support that community interviews were conducted? If yes, how have community interviews guided the EPA's response to community concerns? If no, does the EPA plan on conducting community interviews prior to the next Record of Decision?

Thank you for your consideration.

Ed Smith, MCE

Kathleen Logan Smith, MCE

July 25, 2013

Karl Brooks  
Regional Administrator, Region 7  
Environmental Protection Agency  
11201 Renner Blvd.  
Lenexa, KS 66219

RE: West Lake Landfill Superfund Site

Dear Mr. Brooks:

The West Lake Landfill impacted communities request answers to the below questions. During a June 26, 2013 meeting with Administrator Brooks, the Missouri Coalition for the Environment agreed to work with community members to only send questions regarding the landfill once a month. The Environmental Protection Agency has yet to respond to questions submitted in May and June of 2013. The West Lake Landfill impacted communities continue to be concerned about the safety of citizens living in proximity to the landfill and depend on the EPA to address our concerns as the lead regulatory agency. The undersigned community members expect the EPA to provide a written response within 4 weeks of receiving this letter.

1. How close can the subsurface smoldering event approach West Lake Landfill before the EPA interjects and emergency actions are taken? Meaning, does the EPA have a "red line" for its involvement?
2. Has the EPA received any information regarding groundwater flow at the West Lake Landfill from the USGS? Is there a timeframe for USGS involvement?
4. Where exactly will the off-site groundwater samples be collected surrounding the West Lake Landfill Superfund Site? Will a sampling plan be made available for comment before sampling is conducted?
5. Will EPA provide groundwater sampling (both on-site and off-site) locations, results, and plans with the community?
6. How does the EPA explain levels of Radium-226 and Radium-228 outside of Operable Unit 1? For example: The Responsiveness Summary from 2008 (page 3) states "only four wells exhibited a total radium concentration above the MCL of 5 picocuries per liter (pCi/l)" with the maximum reading being 6.33pCi/l. A map in the Groundwater Monitoring report dated December 14th displays 20 wells that show radium levels above 5pCi/l with PZ-101-SS reading 32.01pCi/l, which is outside of Area-1 and Area-2 of Operable Unit 1.
  - a) With the increase in the concentration of Radium from the wells, how can the EPA continue to state that the levels of Radium being read are naturally occurring?

b) Can the EPA explain the significant increase in wells that showed Radium above 5 PiC/l?

7. Does the EPA contend that 8,700 tons of leached barium sulfate from Latty Avenue was mixed with 38,000 tons to 39,000 tons of "clean material" as stated in the Responsiveness Summary (page 13)?

8. What studies/investigation did the National Remedy and Review Board recommend EPA Region 7 conduct to better understand the West Lake Landfill?

9. Why was the fence along OU-1 Area 1 moved closer to the St. Charles Rock Road? What day(s) was the new fence constructed? By whose order?

10. Will the EPA provide digital records on its website of all documents in the "administrative record" and "public record" concerning West Lake Landfill?

11. How many Superfund Sites in Region 7 involve radiological contamination? Has EPA Region 7 executed a ROD at a radioactive Superfund Site? If so, which ones and when?

12. How can the EPA conclude that the radioactive materials are contained based on the ASPECT plane, which only measured gamma radiation up to one foot, while the radioactive wastes are buried up to 15 feet deep and there is no liner to prevent groundwater contamination?

13. Has the EPA conducted community interviews of "impacted communities" in the last ten years? If yes, does the EPA have evidence to support that community interviews were conducted? If yes, how have community interviews guided the EPA's response to community concerns? If no, does the EPA plan on conducting community interviews prior to the next Record of Decision?

Thank you for your consideration.

Sincerely,

West Lake Landfill Impacted Communities & MCE

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Signature	First (Print)	Last (Print)	Phone	Address	City	ZIP
Mary Catherine Dunn	MARY	DUNN	314-739-7450	3223 PARKWOOD LN	MARYLAND HTS	63043
Dandra Buzzetta	Sandy	Buzzetta	314-498-0633	192 Hunters Pointe	ST. Charles	6330X
Irene Kennebeck	IRMA	KENNEBECK	314-768-1826	3221 McKELVEY RD	BRIDGETON	63044
Pam-Dusser	Pebt	Dusser	314-629-0705	9084 PATRICK DR	ST. John	63114
Jeanne Allen	JEANNE	TERREL	849.2404 314. <del>TER</del>	8840 GLENWOOD DR.	ST. LOUIS	63126
Deanna Dwyer	Deanna	DEMEKE	314-738-0957	308 Lake Ave	Mt. Airy	63083
Linda Leib	Linda	Leib	314 291-7956	11691 Donnycare Ln	Maryland HTS	63043
Mr. Richards	Fel	Richards		12066 Autumn Lakes Dr.	Maryland HTS	63043
Saul Fein	Saul	Fein		"	"	"
John H. Fisher	JOHN	Fischer	205-0227	383 Autumn Tr. Dr	Maryland HTS	63043
Brad Chenoweth	BRAD	CHENOWETH	314 482-6237	3318 GREEN BRIDGE	BRIDGETON	63044



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Signature	First (Print)	Last (Print)	Phone	Address	City	ZIP
<i>Michael Williams</i>	MICHAEL	WILLIAMS	314 813-4533	1308 COLUMBUS DR ST LOUIS MO 63138	ST LOUIS	63138
<i>Mary Williams</i>	Mary Christine	Williams	314-667-6332	1308 Columbus Dr ST LOUIS MO	ST LOUIS	63138
<i>Susan Sieger</i>	Susan	Sieger	314-971-4595	950 Chula Drive	Hazelwood	63042
<i>Margaret Graham</i>	Margaret	GRAHAM	314-434-1500	12087 Fleetwood	Maryland Hts	63043
<i>Elaine Stern</i>	Elaine	Stern	314 653 0424	1312 DAMIAN	STL	63138
<i>Kathy Bell</i>	Kathy	Bell	314-298-0223	12736 San Clemente	Bridgeton	63044
<i>Chuck Bell</i>	Chuck	Bell	"	"	"	"
<i>Katherine Randolph</i>	Katherine	Randolph	314-291-7364	3372 San Sevi 1/4 CT	Bridgeton	63044
<i>Sandy Schwartz</i>	SANDY	Schwartz	314-768-1828	3221 McKelvey Rd.	Bridgeton	63044
<i>Mary Ann Ford</i>	Mary Ann	Ford	314-302-7593	800 Keeneland Rd	Florissant	63034
<i>Rhonda Steelman</i>	Rhonda	Steelman	314 800 7455	3412 Ludlow Ave	Bridgeton	63044



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Signature	First (Print)	Last (Print)	Phone	Address	City	ZIP
Mary McElaney	MARY	McElaney	312/6095523	2419 Weyford	Maryland Heights	63043
John Smith	John	Smith	314-739-6470	12004 Autumn Lakes Dr.	Maryland Heights	63042
Cindy Finnegan	Cindy	Finnegan	314 566 9630	1836 Tawny Ash Dr	St. Louis	63146
Steve Chenaweth	Steve	Chenaweth	(314) 809-5940	3318 Greenbridge Dr	Bridgeton	63044
Loeb Clarke	Todd	Nickel	314 685-6297	12141 H. Herest	Maryland Heights	63043
Megan Richardson	Megan	Richardson	314-608-3036	1 Yankee Jim Ct	St. Peters	63374
Katie Keever	Katie	Keever	314-223-7559	3314 Bridgeton Trails Dr.	Bridgeton	63044
Rhonda Steelman	Rhonda	Steelman	314-800-7455	3412 Ludlow Ave	Bridgeton	63044
Randy Ham	Randy	Ham	314-295-1700	4137 SCOTCH		63044

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Signature	First (Print)	Last (Print)	Phone	Address	City	ZIP
<i>Susan Folle</i>	Susan	Folle	630-887-0883	1604 Silver Hills Ct	Wentzville	63385
<i>Jennifer Smith</i>	Jennifer	Smith	630-696-3701	11	11	11
<i>Gwendolyn Verhoff</i>	Gwendolyn	Verhoff	314-435-6343	10450 Decker	Overland	63114
<i>Marilyn Caldwell</i>	Marilyn	Caldwell	314-838-9518	809 Keene Land Rd	Florissant	63034
<i>Mary McCarty</i>	MARY	McCarthy	314-609-5563	2419 Mayford	Maryland Hts	63043
<i>Clare Duffy</i>	Clare	Duffy	314-291-3144	3110 Autumn Tr. Dr.	Maryland Hts	63043
<i>Vernita Wilson</i>	Vernita	Wilson	314-739-8405	3538 El Terral Ct	Bridgeton	63044
<i>Megan Richardson</i>	Megan	Richardson	314-608-3030	1 Yankee Inn Ct	St. Peters	63376
<i>Pat Mansell</i>	PAT					
<i>Pat Mansell</i>	PAT	Mansell	314-739-2119	3521 E Fenwick	Bridgeton	63044
<i>Robert Duizer</i>	Bob	Duizer	314-739-0578	3880 Apple Pl Ct	Bridgeton	63044
<i>Sharon Duizer</i>	Sharon	Duizer		Bridgeton, Mo. 63044	Bridgeton	63044

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<i>Gwendolyn Huber</i>	Jennifer	Huber	314-344-9052	2524 Crue Coeur Mill Rd #9	Maryland Heights	63043
<i>Ferdinand E. Feltz</i>	FERDINAND	FELTSC H	314-291-3021	3376 TUSCANY HILLS CT	BRIDGETON	63044
<i>Mr. S. Janitch</i>	JLo	Janitch	314-739-6470	Dr. 12004 Autumn Lakes	Maryland Hts.	63043
<i>Cynthia Finnegan</i>	Cynthia	Finnegan	314-566-9630	1836 Tawny Ash Dr	STL MO	63146
<i>Bill Wilson</i>	BILL	WILSON	314-739-8405	3538 EL FERROL CT.	BRIDGETON	63044
<i>Deleen Onf</i>	SR Ellen	Onf	636 293 8253	204 N. MAIN ST	O'FALLON	63366
<i>Gaudy How</i>	RANIZY	HEIN	314-298-1701	4107 SCOTCH	BRIDGETON	63044
<i>Katie Keenon</i>	Katie	Keenon	314-223-7559	3314 Bridgeton Trails Dr	Bridgeton	63044
<i>John Willard</i>	Jodi	Willard	314-726-4844	11846 Administration	Bridgeton	63044